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H. THOMAS MORAN, II, Court-Appointed
Receiver of LYDIA CAPITAL, LLC

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

THE LINCOLN NATIONAL LIFE
INSURANCE COMPANY,

Plaintiff,

v.

H. THOMAS MORAN, II, Court-Appointed
Receiver of LYDIA CAPITAL, LLC,

Defendant.

Case No. 08-CV-0023-IEG-NLS

**JOINT MOTION OF PLAINTIFF, THE
LINCOLN NATIONAL LIFE INSURANCE
COMPANY AND DEFENDANT, H.
THOMAS MORAN, II, COURT-
APPOINTED RECEIVER FOR LYDIA
CAPITAL, LLC, FOR THE EXTENTION OF
TIME TO AMEND PLEADINGS TO ADD
PARTIES**

Plaintiff, The Lincoln National Life Insurance Company ("Lincoln") and Defendant, H. Thomas Moran, II, Court-Appointed Receiver of Lydia Capital, LLC (the "Receiver"), respectfully request the Court to extend the time to amend the pleadings to add parties from August 29, 2008, to September 15, 2008. Lincoln and Moran jointly seek this extension of time because they are currently engaged in indemnification discussions with the insurance policy's insured, trustee and

agent; and, at the conclusion of these discussions, the insured, trustee and agent may be proper parties to this lawsuit. Lincoln and Moran, therefore, respectfully request that the Court extend the time to add parties from August 29, 2008, to September 15, 2008.

WHEREFORE, Plaintiff, The Lincoln National Life Insurance Company and Defendant, H. Thomas Moran, II, Court-Appointed Receiver of Lydia Capital, LLC, respectfully request that the Court enter an Order granting an extension of time to amend the pleadings to add parties from August 29, 2008, to September 15, 2008.

Respectfully submitted,

s/ Jason P. Gosselin

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